

SCOTT TURNAGE, CORTEZ D. BROWN, DEONTAE
TATE, JEREMY S. MELTON, ESTATE OF ISSACCA
POWELL, KEITH BURGESS, TRAVIS BOYD,
TERRENCE DRAIN, and KIMBERLY ALLEN on
behalf of themselves and all similarly situated persons,

Case No. 2:16-cv-2907-SHM/tmp

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO DEFENDANT, TETRUS CORP.'S MOTION TO DISMISS
PLAINTIFF'S SEVENTH AMENDED COMPLAINT**

COME NOW the Plaintiffs, Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, the Estate of Issacca Powell, Keith Burgee, Travis Boyd, Terrence Drain, and Kimberly Allen, by and through their undersigned attorney and move this Court for a two (2) week extension to respond to Defendant, Tetrus Corp.'s Motion to Dismiss Plaintiff's Seventh Amended Complaint. As grounds for the Motion, Plaintiffs state:

1. On August 31, 2020, Tetrus filed its Motion to Dismiss Plaintiff's Seventh Amended Complaint (ECF No. 346). Plaintiffs' response to said Motion is due September 30, 2020.

2. Plaintiffs now respectfully request a short extension of time, to respond to Tetrus Corp.'s Motion to Dismiss Plaintiff's Seventh Amended Complaint, up to and including October 15, 2020. This extension is necessary to provide Plaintiffs adequate time to complete its investigation, as well as to research and otherwise draft their response.

3. Defendants' attorney has not indicated Defendants will not oppose this motion.

Respectfully submitted,

/s/ Brice M. Timmons

Michael G. McLaren (#5100)

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CERTIFICATE OF CONSULTATION

The undersigned hereby certifies that pursuant to Local Rule 7.2, counsel for Plaintiffs have consulted and agreed that they do not oppose the request for a two (2) week extension to file a response.

/s/Brice M. Timmons

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served upon all counsel of record in this cause electronically through the Court's ECF filing system, on this the 25th day of September 2020.

/s/ Brice M. Timmons

Respectfully submitted,

/s/ Brice M. Timmons
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing has been filed via the Court's ECF system this 25th day of September, 2020, for service on all persons registered in connection with this case, including:

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